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6 **IN THE UNITED STATES DISTRICT COURT FOR THE**  
7 **WESTERN DISTRICT OF WASHINGTON AT SEATTLE**

8 ABHIJIT BAGAL, an individual,

9 *Plaintiff,*

10 v.

11 KSHAMA SAWANT, in her official  
12 and individual capacities as  
13 Councilmember, District 3, of the  
14 Seattle City Council;  
15 LISA HERBOLD, in her official and  
16 individual capacities as  
17 Councilmember, District 1, of the  
18 Seattle City Council; and  
19 BRUCE HARRELL, in his official and  
20 individual capacities as the Mayor of  
21 the City of Seattle,

22 *Defendants.*

Civil Action No. 2:23-cv-00721-RAJ

Action Filed: May 11, 2023

Judge: Hon. Richard A. Jones

**PLAINTIFF'S REQUEST FOR  
JUDICIAL NOTICE IN SUPPORT  
OF OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS UNDER FRCP 12(b)(1)  
and 12(b)(6)**

*[Filed Concurrently with  
PLAINTIFF'S OPPOSITION TO  
DEFENDANTS' MOTION TO  
DISMISS UNDER FRCP 12(b)(1)  
and 12(b)(6)]*

18 As provided by Federal Rule of Evidence 201 and Federal Rule of Civil Procedure 44.1,  
19 and in connection with Plaintiff's Opposition to Defendants' Motion to Dismiss under FRCP  
20 12(b)(1) and 12(b)(6), Plaintiff Abhijit Bagal, *Pro Se*, hereby requests that the Court take judicial  
21 notice of the following.:

- 22 1. Office of Seattle City Clerk - CF 322573 Document and Supporting Research: Equality  
23 Labs, Caste in the United States, (2018) "Upper" Caste Hindus are often vegetarian. See  
24

1 [http://clerk.seattle.gov/~cfpics/cf\\_322573f.pdf](http://clerk.seattle.gov/~cfpics/cf_322573f.pdf) A true and correct copy of page 23 of the  
2 above document is attached hereto as **Exhibit A with Declaration 5.**

- 3 2. Judgement on the Pleadings, Sunil Kumar, Ph. D. v. Dr. Jolene Koester, 2:22-cv-07550,  
4 (C.D. Cal. Jul 25, 2023) ECF No. 102. See

5 <https://www.courtlistener.com/docket/65547809/102/sunil-kumar-ph-d-v-dr-jolene-koester/>

6 A true and correct copy of this document is attached hereto as **Exhibit B with**  
7 **Declaration 6.**

- 8 3. Public hearing announcement on Official Seattle City Councilmember Facebook page of  
9 Defendant Kshama Sawant created by her on May 23, 2023. See

10 <https://www.facebook.com/events/971630427348719/> A true and correct copy of this

11 document is attached hereto as **Exhibit C with Declaration 7.**

- 12 4. CoHNA (a grassroots advocacy group representing Hindu-Americans) Caste Survey, based  
13 on a YouGov US national sample of 1,500 responses. See [https://cohna.org/new-survey-](https://cohna.org/new-survey-analyzes-awareness-of-caste-in-the-us/)

14 [analyzes-awareness-of-caste-in-the-us/](https://cohna.org/new-survey-analyzes-awareness-of-caste-in-the-us/) A true and correct copy of this document is  
15 attached hereto as **Exhibit D with Declaration 8.**

- 16 5. Seattle City Clerk Documents and Research supporting Council Bill 120511, relating to  
17 caste discrimination. See <http://clerk.seattle.gov/search/clerk-files/322573> A true and

18 correct copy of this document is attached hereto as **Exhibit E with Declaration 9.**

- 19 6. Seattle City Council News Release - Councilmember Sawant Proposes Legislation Against  
20 Caste Discrimination, January 24, 2023. See

21 [https://council.seattle.gov/2023/01/24/councilmember-sawant-and-south-asian-community-](https://council.seattle.gov/2023/01/24/councilmember-sawant-and-south-asian-community-leaders-introduce-first-in-the-nation-legislation-to-ban-caste-discrimination/)  
22 [leaders-introduce-first-in-the-nation-legislation-to-ban-caste-discrimination/](https://council.seattle.gov/2023/01/24/councilmember-sawant-and-south-asian-community-leaders-introduce-first-in-the-nation-legislation-to-ban-caste-discrimination/) A true and

23 correct copy of this document is attached hereto as **Exhibit F with Declaration 10.**

- 24 7. Councilmember Kshama Sawant's Joint Announcement with other activist groups. See

[https://docs.google.com/forms/d/e/1FAIpQLSffwpxH\\_5o0-](https://docs.google.com/forms/d/e/1FAIpQLSffwpxH_5o0-)

1 [z90VoNVYnYyMhj3UnICtdsHVUcHZ79APBGEO/viewform](http://z90VoNVYnYyMhj3UnICtdsHVUcHZ79APBGEO/viewform) A true and correct copy of  
2 this document is attached hereto as **Exhibit G with Declaration 11.**

3 8. Documents and Research Main Page. See <http://clerk.seattle.gov/search/clerk-files/322573>

4 The specific email can be accessed from this page and is linked with the text

5 ‘Councilwoman Kshama Sawant comments about CoHNA.’ See

6 [http://clerk.seattle.gov/~cfpics/cf\\_322573pp.pdf](http://clerk.seattle.gov/~cfpics/cf_322573pp.pdf) A true and correct copy of this document  
7 is attached hereto as **Exhibit H with Declaration 12.**

8 9. Letter to Rep. Pramila Jayapal dated February 17, 2023. See [https://sawant.seattle.gov/my-](https://sawant.seattle.gov/my-letter-to-rep-pramila-jayapal-support-our-fight-to-make-seattle-the-first-city-to-ban-caste-discrimination/)

9 [letter-to-rep-pramila-jayapal-support-our-fight-to-make-seattle-the-first-city-to-ban-caste-](https://sawant.seattle.gov/my-letter-to-rep-pramila-jayapal-support-our-fight-to-make-seattle-the-first-city-to-ban-caste-discrimination/)

10 [discrimination/](https://sawant.seattle.gov/my-letter-to-rep-pramila-jayapal-support-our-fight-to-make-seattle-the-first-city-to-ban-caste-discrimination/) A true and correct copy of this document is attached hereto as **Exhibit I**  
11 **with Declaration 13.**

12 10. Seattle City Council News Release - Sawant, Community Members Celebrate... See

13 [https://council.seattle.gov/2020/02/04/sawant-community-members-celebrate-passage-of-](https://council.seattle.gov/2020/02/04/sawant-community-members-celebrate-passage-of-city-council-resolution-opposing-religious-persecution-detention-camps-by-right-wing-regime-in-india/)

14 [city-council-resolution-opposing-religious-persecution-detention-camps-by-right-wing-](https://council.seattle.gov/2020/02/04/sawant-community-members-celebrate-passage-of-city-council-resolution-opposing-religious-persecution-detention-camps-by-right-wing-regime-in-india/)

15 [regime-in-india/](https://council.seattle.gov/2020/02/04/sawant-community-members-celebrate-passage-of-city-council-resolution-opposing-religious-persecution-detention-camps-by-right-wing-regime-in-india/) A true and correct copy of this document is attached hereto as **Exhibit J**  
16 **with Declaration 14.**

17 11. Stigmatic Harm and Standing. See

18 [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=895194](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=895194) A true and correct copy of

19 this document is attached hereto as **Exhibit K with Declaration 15.**

20 12. Public FAQ On Councilmember Kshama Sawant’s Official Letterhead threatening Hindu-

21 Americans. See

22 [https://docs.google.com/document/d/1exszRVrkKogZQGW\\_croebiWthsCTDMXUupP9lt](https://docs.google.com/document/d/1exszRVrkKogZQGW_croebiWthsCTDMXUupP9ltXpog/edit)

23 [Xpog/edit](https://docs.google.com/document/d/1exszRVrkKogZQGW_croebiWthsCTDMXUupP9ltXpog/edit) A true and correct copy of this document is attached hereto as **Exhibit L with**  
24 **Declaration 16.**

- 1 13. Seattle’s Definition of Caste, copied from Merriam-Webster dictionary – Definition (3) of  
2 Caste. See [https://www.seattle.gov/civilrights/civil-rights-enforcement/new-laws-and-](https://www.seattle.gov/civilrights/civil-rights-enforcement/new-laws-and-amendments/caste)  
3 [amendments/caste](https://www.seattle.gov/civilrights/civil-rights-enforcement/new-laws-and-amendments/caste) A true and correct copy of this document is attached hereto as **Exhibit**  
4 **M with Declaration 17.**
- 5 14. Memorandum to Seattle City Council from Asha Venkataraman, Analyst/Central Staff dated  
6 February 16, 2023, providing background information on protected classes and caste as  
7 defined by the Merriam-Webster dictionary. See  
8 [http://seattle.legistar.com/View.ashx?M=F&ID=11651954&GUID=8BB5B94B-EB71-](http://seattle.legistar.com/View.ashx?M=F&ID=11651954&GUID=8BB5B94B-EB71-40C1-B5CF-D0A8D75D8877)  
9 [40C1-B5CF-D0A8D75D8877](http://seattle.legistar.com/View.ashx?M=F&ID=11651954&GUID=8BB5B94B-EB71-40C1-B5CF-D0A8D75D8877) A true and correct copy of this document is attached hereto  
10 as **Exhibit N with Declaration 18.**
- 11 15. Merriam Webster Dictionary’s Primary/First definition of caste includes: (1) “one of the  
12 hereditary social classes in Hinduism that restrict the occupation of their members and their  
13 association with members of other castes”; and Secondary: (2) “a division of society based  
14 on differences of wealth, inherited rank or privilege, profession, occupation, or race”; and  
15 (3) “system of stratification characterized by hereditary status, endogamy, and social  
16 barriers sanctioned by custom, law, or religion.” See [https://www.merriam-](https://www.merriam-webster.com/dictionary/caste)  
17 [webster.com/dictionary/caste](https://www.merriam-webster.com/dictionary/caste) A true and correct copy of this document is attached hereto  
18 as **Exhibit O with Declaration 19.**
- 19 16. Ministry of Social Justice & Empowerment, Government of India, State wise List of  
20 Scheduled Castes. See <https://socialjustice.gov.in/common/76750> A true and correct copy  
21 of this document is attached hereto as **Exhibit P with Declaration 20.**
- 22 17. India’s Caste System manifests in Seattle... South Asian caste system ... is a hierarchical  
23 system dating back thousands of years... originated from Hinduism in India... See  
24 [http://clerk.seattle.gov/~cfpics/cf\\_322573nn.pdf](http://clerk.seattle.gov/~cfpics/cf_322573nn.pdf) A true and correct copy of this document  
is attached hereto as **Exhibit Q with Declaration 21.**

1 18. Hostility towards Hindu-Americans while praising and giving preferential treatment to  
2 Muslim-Americans. See [https://mailchi.mp/seattle/have-you-experienced-caste-](https://mailchi.mp/seattle/have-you-experienced-caste-discrimination-or-islamophobia?e=[UNIQID])  
3 [discrimination-or-islamophobia?e=\[UNIQID\]](https://mailchi.mp/seattle/have-you-experienced-caste-discrimination-or-islamophobia?e=[UNIQID]) Prior Posts dated May 23, 2023, and June 25,  
4 2023, demonstrating conspiracy to use caste to target Hindu Americans. See  
5 [https://us19.campaign-](https://us19.campaign-archive.com/home/?u=bd9c3de67c9c8780c16467332&id=eb2c34586e)  
6 [archive.com/home/?u=bd9c3de67c9c8780c16467332&id=eb2c34586e](https://us19.campaign-archive.com/home/?u=bd9c3de67c9c8780c16467332&id=eb2c34586e) A true and correct  
7 copy of this document is attached hereto as **Exhibit R with Declaration 22.**

8  
9 Plaintiff respectfully requests this Court to grant judicial notice of the items identifies above.

10 DATED this 2nd day of August 2023 at Morrisville, Wake County, North Carolina.

11 Signature: /s/ Abhijit Bagal

12 Printed Name: ABHIJIT BAGAL (Plaintiff, *Pro Se*)

13 Address: 125 Vista Brooke Drive, Morrisville, NC 27560

14 Phone: (919) 917-3839 Email: abebagal@gmail.com